Remarks

I. <u>Telephone Interview</u>

Applicants thank the Examiner for the courtesy and assistance extended to

Applicants' undersigned attorney during the telephone interview of January 25, 2001. During

the interview, the patentability of the independent claims over U.S. Patent 5,977,978 to Carey

("Carey") was discussed. Specifically, it was discussed whether the intelligent content called

for by independent claim 1 and the remaining independent claims is present in Carey.

Although agreement was not reached, Applicants respectfully submit that all presently

pending claims are patentable over Carey.

II. Rejection of Claims 1-33 Under 35 U.S.C. § 102(e)

In the Office Action mailed September 13, 2000, claims 1-25 were rejected under 35

U.S.C. § 102(e) over Carey. The Office Action further rejected newly submitted claims 26-

33 over Carey.

Applicants respectfully traverse the rejections of claims 1-26 and 29-33. Claims 27

and 28 have been canceled. Applicants respectfully submit that Carey fails to disclose all

elements of presently pending independent claims 1, 10, 14, 20, 26, and 31-33. Claim 1 is

illustrative of these elements. Claim 1, as amended, calls for:

"defining a three-dimensional object as a component, said component being

defined by a three-dimensional content language that includes threedimensional content and interfacing content, said interfacing content being

capable of interfacing with said three-dimensional content without external

interfacing scripting; and

displaying a component interface, said component interface being interactive with said three-dimensional content such that an application

developer is capable of interfacing with said three-dimensional object through

said component interface."

- 11 -

Applicants' claims allow an application developer to interface with a threedimensional object (defined as a component) without the need for additional scripting to be provided by the application developer. As explained in Applicants' Specification, the removal of a scripting requirement greatly simplifies interfacing with three-dimensional

objects. Specification, page 4, lines 12-22. This is more clearly set forth in the amended

claims submitted herewith.

Carey apparently discloses a simplified user interface for which "authors need only learn a few basic skills." Carey, col. 4, lines 16-23. However, Carey's simplified user interface apparently refers to the ease of use that a novice user may experience in using the GUI of Carey to create images and movies. See Carey, col. 4, lines 24-37. Carey apparently fails to contemplate the difficulties of scripting that have been recognized by Applicants in relation to application developers.

In contrast to *Carey*, Applicants' claims call for the capability of interfacing with an *application developer*. It will be appreciated that the development of software applications (programs) by application developers is distinct from the preparation of images and movies by novice users. Applicants' three-dimensional and interfacing content allows application developers to interface with a three-dimensional object without the developers having to provide onerous scripting as required in prior art implementations. See *Specification*, page 7, lines 7-17.

These advantages are facilitated by at least two types of content: three-dimensional content and interfacing content. The interfacing content is capable of interfacing with the three-dimensional content. This allows interaction between a user of a component interface and the three-dimensional content. The three-dimensional content and interfacing content are

- 12 -

included in a three-dimensional language which defines a three-dimensional object as a

component. Carey apparently fails to disclose or contemplate these elements.

Accordingly, Applicants respectfully submit that independent claims 1, 10, 14, 20, 26,

and 31-33 are patentable over Carey for at least the reasons given above. In addition,

Applicants respectfully submit that the remaining dependent claims are patentable for at least

the same reasons.

III. **Conclusion** 

In view of the above Amendments and Remarks, reconsideration of claims 1-26 and

29-33 is requested.

The Commissioner is authorized to charge any underpayment or credit any

overpayment to Deposit Account No. 06-1325 for any matter in connection with this

response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: September 13, 2001

Reg. No. 43,614

FLIESLER, DUBB, MEYER & LOVEJOY LLP

Four Embarcadero Center, Suite 400

San Francisco, California 94111-4156

Telephone: (415) 362-3800

- 13 -

**APPENDIX** 

1. (Twice Amended) A method for [of] interfacing with a three-dimensional

object that is displayed, said method comprising:

defining a [said] three-dimensional object as a component [with a component

interface], said component being defined by a three-dimensional content language that

includes three-dimensional content and interfacing content, said interfacing content being

capable of interfacing with said three-dimensional content without external interfacing

scripting [intrinsically containing an intelligent content]; and

displaying a [said] component interface, said component interface being interactive

with said three-dimensional content such that an application developer is capable of [; and]

interfacing with said three-dimensional object through said component interface.

2. The method of claim 1, wherein said defining said (Twice Amended)

three-dimensional object [as the component intrinsically containing the intelligent content]

comprises:

[defining said component in a three-dimensional content language;]

defining an at least one property to describe said component; and

defining an at least one route to interface said component with a second component,

so that said at least one property and said at least one route comprise a portion of said

interfacing [intelligent] content.

9. The method of claim 1, further comprising [wherein (Twice Amended)

said interfacing with said component comprises]:

displaying [providing] a plurality of component interfaces;

- 14 -

selecting one of said plurality of component interfaces [to access said intelligent

content; and

interfacing with said three-dimensional object through said selecting one of said

plurality of component interfaces].

10. (Amended) An apparatus for interfacing with a three-dimensional object

that is displayed, comprising:

means for defining a [said] three-dimensional object as a component [with a

component interface], said component being defined by a three-dimensional content language

that includes three-dimensional content and interfacing content, said interfacing content being

capable of interfacing with said three-dimensional content without external interfacing

scripting [intrinsically containing an intelligent content]; and

means for displaying a [said] component interface, said component interface being

interactive with said three-dimensional content such that an application developer is capable

of [; and means for] interfacing with said three-dimensional object through said component

interface.

14. (Twice Amended) A computer system for interfacing with a three-

dimensional object that is displayed, comprising:

a means for displaying said three-dimensional object;

a memory for storing a computer program for interfacing with a three-dimensional

object displayed on said displaying means, said computer program capable of:

defining a [said] three-dimensional object as a component [with a component

interface], said component being defined by a three-dimensional content language that

- 15 -

includes three-dimensional content and interfacing content, said interfacing content being capable of interfacing with said three-dimensional content without external interfacing scripting [intrinsically containing an intelligent content]; and

displaying a [said] component interface on said displaying means, said

component interface being interactive with said three-dimensional content such that an

application developer is capable of [; and] interfacing with said three-dimensional object

through said component interface; and

a processor for executing said computer program in conjunction with said monitor.

15. (Twice Amended) The computer system of claim 14, wherein said defining said three-dimensional object [as the component intrinsically containing the intelligent content] comprises:

[defining said component in a three-dimensional content language;]

defining an at least one property to describe said component; and

defining an at least one route to interface said component with a second component,

so that said at least one property and said at least one route comprise a portion of said

interfacing [intelligent] content.

19. (Twice Amended) The computer system of claim 14, <u>further comprising</u> [wherein said interfacing with said three-dimensional object comprises]:

<u>displaying</u> [providing] a plurality of component interfaces; and selecting one of said plurality of component interfaces [to access said intelligent content].

- 16 -

20. (Twice Amended) A computer readable medium having a computer program stored thereon that, when loaded into a computer, cause said computer to perform a function for [of] interfacing with a three-dimensional object displayed on said computer, said computer interfacing with said three-dimensional object by:

defining a [said] three-dimensional object as a component [with a component interface], said component being defined by a three-dimensional content language that includes three-dimensional content and interfacing content, said interfacing content being capable of interfacing with said three-dimensional content without external interfacing scripting [intrinsically containing an intelligent content]; and

displaying <u>a</u> [said] component interface, <u>said component interface being interactive</u> with said three-dimensional content such that an application developer is capable of [; and] interfacing with said three-dimensional object through said component interface.

21. (Twice Amended) The computer readable medium of claim 20, wherein said defining said three-dimensional object [as the component intrinsically containing the intelligent content] comprises:

[defining said component in a three-dimensional content language;]

defining an at least one property to describe said component; and

defining an at least one route to interface said component with a second component,

so that said at least one property and said at least one route comprise a portion of said

interfacing [intelligent] content.

25. (Twice Amended) The computer readable medium of claim 20, <u>further</u> comprising [wherein said interfacing with said three-dimensional object comprises]:

displaying [providing] a plurality of component interfaces; and selecting one of said plurality of component interfaces [to access said intelligent content].

26. (Amended) A method <u>for</u> [of] interfacing with a three-dimensional object that is displayed, the method comprising:

defining a [the] three-dimensional object as a component [and a component interface], the component being defined by a three-dimensional content language that includes three-dimensional content and interfacing content, said interfacing content being capable of interfacing with said three-dimensional content without external interfacing scripting [intrinsically containing an intelligent content defining the component and permitting interface with the component];

displaying a [the] component interface, said component interface being interactive

with said three-dimensional content such that an application developer is capable of [; and]

interfacing with the [component] three-dimensional object through the component interface;

providing a property to describe the component; and providing a route to interface the component with a second component.

- 27. (Canceled)
- 28. (Canceled)
- 29. (Amended) The method of claim <u>26</u>, [28 wherein defining the three-dimensional object as the component including the intelligent content includes:

providing a property describing the component; and

providing a route permitting interface with the component;]

wherein the property and the route represent at least a portion of the <u>interfacing</u> [intelligent] content.

30. (Amended) The method of claim 29 wherein the route permits interfacing

[interface of] the component with a second component.

31. (Amended) A method for [of] representing a three-dimensional object as a

component for interfacing with the three-dimensional object, the method comprising:

[defining a component interface; and]

defining a [the] three-dimensional object as a [the] component, said component being

defined by a three-dimensional content language that includes three-dimensional content and

interfacing content, said interfacing content being capable of interfacing with said three-

dimensional content without external interfacing scripting, [such that] the component

includes a property describing the component and a route permitting interface with the

component; and

displaying a [the] component interface, said component interface being interactive

with said three-dimensional content such that an application developer is capable of

interfacing with said three-dimensional object through said component interface.

32. (Amended) A method <u>for</u> [of] representing a three-dimensional object as a

component for interfacing with the three-dimensional object, the method comprising:

- 19 -

defining <u>a</u> [the] three-dimensional object as <u>a</u> [the] component, <u>said component being</u> defined by a three-dimensional content language that includes three-dimensional content and interfacing content, <u>said interfacing content being capable of interfacing with said three-dimensional content</u> dimensional content without external interfacing scripting. [using a three-dimensional content language such that] the component includes at least one property describing the component, and at least one route permitting interface with the component, the at least one property and the at least one route representing at least a portion of <u>said three-dimensional content</u> [an intelligent content contained intrinsically within the component];

defining a plurality of component interfaces; and

displaying the component interfaces, said component interfaces being interactive with said three-dimensional content such that an application developer is capable of interfacing with said three-dimensional object through said component interfaces.

33. (Amended) A method <u>for [of]</u> representing a three-dimensional object as a component for interfacing with the three-dimensional object, the method comprising:

defining a plurality of component interfaces; and.

defining <u>a</u> [the] three-dimensional object as <u>a</u> [the] component, said component being defined by a three-dimensional content language that includes three-dimensional content and interfacing content, said interfacing content being capable of interfacing with said three-dimensional content without external interfacing scripting, [intrinsically containing an intelligent content] said three-dimensional content comprised at least in part by a plurality of properties and a plurality of routes, the properties describing the component and the routes permitting interface with the component.

- 20 -